STATE OF NEVADA



Department of Conservation & Natural Resources

Brian Sandoval, Governor Bradley Crowell, Director Greg Lovato, Administrator

October 1, 2018

Mike Stoker Regional Administrator ORA-1, USEPA Region 9 75 Hawthorne Street San Francisco CA 94105

RE: The Nevada State Implementation Plan for the 2015 Primary and Secondary Ozone NAAQS

Dear Mr. Stoker:

On behalf of Governor Sandoval, as his appointed designee, this letter informs you of our electronic transmittal to USEPA of Nevada's state implementation plan (SIP) for the 2015 ozone national ambient air quality standard (NAAQS). This "infrastructure" SIP is submitted pursuant to Clean Air Act (CAA) sections 110(a)(1) and (2) and embodies Nevada's plan for meeting the CAA requirements for implementing, maintaining and enforcing the 2015 primary and secondary ozone NAAQS. The Nevada Division of Environmental Protection (NDEP) requests approval of this ozone infrastructure SIP into the applicable Nevada SIP.

The following documents comprise the SIP and are being submitted electronically to USEPA's State Planning Electronic Collaboration System (SPeCS) for SIPs:

- The Nevada Division of Environmental Protection Portion of the Nevada State Implementation Plan for the 2015 Ozone NAAQS and appendices.
- September 12, 2018 letter from the Clark County Department of Air Quality Management (CCDAQ) transmitting their 2015 ozone NAAQS infrastructure SIP to the NDEP.
- The Clark County Portion of the State Implementation Plan for the 2015 Ozone NAAQS and appendices.
- August 28, 2018 letter from the Washoe County Health District-Air Quality Management Division (WCHD-AQMD) transmitting their 2015 ozone NAAQS infrastructure SIP to the NDEP.
- The Washoe County Portion of the Nevada State Implementation Plan to Meet the Ozone Infrastructure SIP Requirements of Clean Air Act Section 110(a)(2) and attachments.
- The Nevada Division of Environmental Protection Proof of Adoption of the 2015 Ozone Standard into the Nevada Administrative Code (NAC)

In addition, the NDEP has adopted an amendment to the Nevada Administrative Code (NAC) in support of this infrastructure SIP. The regulatory revision adopts the revised ozone standard in NAC 445B.22097. The amendment (LCB File No. R145-17) is enclosed together with evidence of public participation and adoption. The amendment was adopted by the State Environmental Commission on February 12, 2018, and was approved by Nevada's Legislative Commission and became effective on May 16, 2018. Based on Nevada Revised Statutes 445B.205 and NAC 445B.053, the Administrator of the NDEP has the authority to adopt and submit state implementation plan revisions to the USEPA. The NDEP hereby

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adopts the enclosed regulatory amendment as a SIP revision and requests approval of this submittal into the applicable Nevada SIP.

The enclosed infrastructure SIPs from each of the three Nevada air agencies are organized in table format and list each CAA section 110(a)(2) element and the existing Nevada SIP provisions that satisfy the requirement in each element. The SIPs were developed in accordance with USEPA's September 13, 2013 multipollutant guidance (USEPA, Memorandum to Regional Air Directors, 9/13/13. Guidance on Infrastructure State Implementation Plan (SIP) Elements Under Clean Air Act Sections 110(a)(1) and 110(a)(2). Stephen D. Page).

We certify that all portions of the infrastructure SIP were properly noticed; evidence of public participation and adoption is included with the respective submittals. For the NDEP portion of the SIP, the Administrator of the NDEP has the authority to adopt and submit state implementation plans to USEPA. The NDEP hereby adopts the NDEP's portion of Nevada's infrastructure SIP as SIP revisions and requests approval of this submittal into the applicable Nevada SIP.

With the exception of those elements or sub-elements that depend on a SIP-based PSD program, the NDEP requests that the USEPA propose approval of the enclosed plan to implement, maintain and enforce the 2015 ozone NAAQS. The NDEP further requests that generally as provisions in Nevada's applicable SIP are replaced or removed through subsequent approvals by USEPA of SIP revisions submitted by the NDEP, USEPA also replace or remove those provisions in this submittal and all of Nevada's CAA 110(a)(2) SIPs.

We have attached an electronic courtesy copy of the SIP to this transmittal letter. If you should have any questions about this submittal or require additional clarification, you may contact Danilo Dragoni, Chief, Bureau of Air Quality Planning at (775) 687-9340.

Sincerely

Greg Lovato Administrator

ec w/o enclosures

Elizabeth Adams, Acting Director, Air Division, USEPA Region IX
Anita Lee, Acting Chief, Planning Office, USEPA Region IX
Bradley Crowell, Director, Nevada Department of Conservation and Natural Resources
Danilo Dragoni, Chief, Bureau of Air Quality Planning, NDEP
Lisa Kremer, Chief, Bureau of Air Pollution Control, NDEP
Charlene Albee, Director, Washoe County Health District, AQMD
Marci Henson, Director, Clark County Department of Air Quality